



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

OCT - 3 2017

Mr. John Michels
Running Foxes Petroleum, Inc.
1690 155th St
Fort Scott, Kansas 66701

RE: SPCC Inspection
Running Foxes Petroleum Inc. – North Stoner Lease
South 100 Rd at East Hudson Road
Richards, Missouri 64778

Dear Mr. Michels:

On July 28, 2017, a representative of the U.S. Environmental Protection Agency inspected Running Foxes Petroleum's North Stoner Lease located at South 100 Rd at East Hudson Road, 3.4 miles northwest of Richards, Missouri. The inspection was done under the authority of Section 308 of the Clean Water Act, 33 U.S.C. § 1318. A copy of the Spill Prevention Control and Countermeasures Field Inspection and Plan Review Checklist Form is enclosed for your information, and a comprehensive list of comments can be located in Attachment E.

The EPA is presently reviewing the findings of the report to determine your facility's compliance with the applicable statutes and regulations. If it is determined that violations exist, the EPA reserves all rights it may have to take appropriate enforcement action.

If there are any questions regarding this report or actions that you may want to take, please contact me at (913) 551-7928.

Sincerely,

A handwritten signature in black ink, appearing to read "Eduardo A. Ortiz", is written over a horizontal line.

Eduardo A. Ortiz
Environmental Engineer
Chemical and Oil Release Prevention Branch
Air and Waste Management Division

Enclosure





U.S. ENVIRONMENTAL PROTECTION AGENCY SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

Running Foxes Petroleum Inc. – North Stoner Lease, Vernon County, MO

Overview of the Checklist

This checklist is designed to assist EPA inspectors in conducting a thorough and nationally consistent inspection of a facility's compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112. It is a required tool to help federal inspectors (or their contractors) record observations for the site inspection and review of the SPCC Plan. While the checklist is meant to be comprehensive, the inspector should always refer to the SPCC rule in its entirety, the SPCC Regional Inspector Guidance Document, and other relevant guidance for evaluating compliance. This checklist must be completed in order for an inspection to count toward an agency measure (i.e., OEM inspection measures or GPRA). The completed checklist and supporting documentation (i.e. photo logs or additional notes) serve as the inspection report.

This checklist addresses requirements for onshore oil drilling, production and workover facilities (including Tier II Qualified Facilities that meet the eligibility criteria set forth in §112.3(g)(2)). Qualified facilities must meet the rule requirements in §112.6 and other applicable sections specified in §112.6, except for deviations that provide environmental equivalence and secondary containment impracticability determinations as allowed under §112.6.

The checklist is organized according to the SPCC rule. Each item in the checklist identifies the relevant section and paragraph in 40 CFR part 112 where that requirement is stated.

- Sections 112.1 through 112.5 specify the applicability of the rule and requirements for the preparation, implementation, and amendment of SPCC Plans. For these sections, the checklist includes data fields to be completed, as well as several questions with "yes," "no" "NA" answers.
- Section 112.6 includes requirements for qualified facilities. These provisions are addressed in Attachment D.
- Section 112.7 includes general requirements that apply to all facilities (unless otherwise excluded).
- Section 112.9 specifies spill prevention, control, and countermeasures requirements for onshore oil drilling, production and workover facilities
- Section 112.10 specifies spill prevention, control, and countermeasures requirements for onshore oil drilling, production, and workover facilities.

The inspector needs to evaluate whether the requirement is addressed adequately or inadequately in the SPCC Plan and whether it is implemented adequately in the field (either by field observation or record review). For the SPCC Plan and implementation in the field, if a requirement is addressed adequately, mark the "Yes" box in the appropriate column. If a requirement is not addressed adequately, mark the "No" box. If a requirement does not apply to the particular facility or the question asked is not appropriate for the facility, mark as "NA". Discrepancies or descriptions of inspector interpretation of "No" vs. "NA" may be documented in the comments box subsequent to each section. If a provision of the rule applies only to the SPCC Plan, the "Field" column is shaded.

Space is provided throughout the checklist to record comments. Additional space is available as Attachment E at the end of the checklist. Comments should remain factual and support the evaluation of compliance.

Attachments

- Attachment A is for recording information about containers and other locations at the facility that require secondary containment.
- Attachment B is a checklist for documentation of the tests and inspections the facility operator is required to keep with the SPCC Plan.
- Attachment C is a checklist for oil spill contingency plans following 40 CFR 109. Unless a facility has submitted a Facility Response Plan (FRP) under 40 CFR 112.20, a contingency plan following 40 CFR 109 is required if a facility determines that secondary containment is impracticable as provided in 40 CFR 112.7(d). The same requirement for an oil spill contingency plan applies to the owner or operator of a facility with qualified oil-filled operational equipment that chooses to implement alternative requirements instead of general secondary containment requirements as provided in 40 CFR 112.7(k).
- Attachment D is a checklist for Tier II Qualified Facilities.
- Attachment E is for recording additional comments or notes.
- Attachment F is for recording information about photos.

FACILITY INFORMATION

FACILITY NAME: Running Foxes Petroleum Inc. – North Stoner Lease

LATITUDE: 37.933783°

LONGITUDE: -94.614497°

GPS DATUM: WGS84

Section/Township/Range: SW1/4, S6, T36N, R33W

FRS#/OIL DATABASE ID:

ICIS#:

ADDRESS: South 100 Rd at East Hudson Road, 3.4 miles northwest of Richards, MO

CITY: Richards

STATE: MO

ZIP: 64778

COUNTY: Vernon

MAILING ADDRESS (IF DIFFERENT FROM FACILITY ADDRESS – IF NOT, PRINT "SAME"): 1690 155th St.

CITY: Fort Scott

STATE: KS

ZIP: 66701

COUNTY:

TELEPHONE: (620) 305-8256

FACILITY CONTACT NAME/TITLE: John Michels, Field Supervisor

OWNER NAME: Running Foxes Petroleum, Inc.

OWNER ADDRESS: 4B Inverness Court East, Suite 120

CITY: Englewood

STATE: CO

ZIP: 80112

COUNTY:

TELEPHONE: 303-617-7242

FAX:

EMAIL:

FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER – IF NOT, PRINT "SAME"): same

OPERATOR ADDRESS:

CITY:

STATE:

ZIP:

COUNTY:

TELEPHONE:

OPERATOR CONTACT NAME/TITLE: same

FACILITY TYPE: oil production lease

NAICS CODE:

HOURS PER DAY FACILITY ATTENDED: 1

TOTAL FACILITY CAPACITY: 50,820 gallons

TYPE(S) OF OIL STORED: crude oil; oil-water mix; salt water

LOCATED IN INDIAN COUNTRY? ☐ YES ☒ NO RESERVATION NAME:**INSPECTION/PLAN REVIEW INFORMATION**

PLAN REVIEW DATE: 8/8/2017

REVIEWER NAME: Jeff Pritchard

INSPECTION DATE: 7/28/2017

TIME: 9:30 AM

ACTIVITY ID NO:

LEAD INSPECTOR: Jeff Pritchard

OTHER INSPECTOR(S): Melinda Luetke

INSPECTOR ACKNOWLEDGMENT

I performed an SPCC inspection at the facility specified above.

INSPECTOR SIGNATURE: 

DATE:

8-16-17

SUPERVISOR REVIEW/SIGNATURE: 

DATE:

8/18/17

SPCC GENERAL APPLICABILITY—40 CFR 112.1**IS THE FACILITY REGULATED UNDER 40 CFR part 112?**

The completely buried oil storage capacity is over 42,000 U.S. gallons, OR the aggregate aboveground oil storage capacity is over 1,320 U.S. gallons AND

☒ Yes ☐ No

The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States

☒ Yes ☐ No

AFFECTED WATERWAY(S): Unnamed tributary to Shiloh Creek

DISTANCE: < 750 feet to tributary; 2.5 miles to Shiloh Creek

FLOW PATH TO WATERWAY: surface drainage to unnamed tributary to Shiloh Creek

Note: The following storage capacity is not considered in determining applicability of SPCC requirements:

- Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993; Tank trucks that return to an otherwise regulated facility that contain only residual amounts of oil (EPA Policy letter)
- Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281;
- Underground oil storage tanks deferred under 40 CFR part 280 that supply emergency diesel generators at a nuclear power generation facility licensed by the Nuclear Regulatory Commission (NRC) and subject to any NRC provision regarding design and quality criteria, including but not limited to CFR part 50;
- Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment); (This does not include other oil containers located at a wastewater treatment facility, such as generator tanks or transformers)
- Containers smaller than 55 U.S. gallons;
- Permanently closed containers (as defined in §112.2);
- Motive power containers (as defined in §112.2);
- Hot-mix asphalt or any hot-mix asphalt containers;
- Heating oil containers used solely at a single-family residence;
- Pesticide application equipment and related mix containers;
- Any milk and milk product container and associated piping and appurtenances; and
- Intra-facility gathering lines subject to the regulatory requirements of 49 CFR part 192 or 195.

Does the facility have an SPCC Plan?

☒ Yes ☐ No

FACILITY RESPONSE PLAN (FRP) APPLICABILITY—40 CFR 112.20(f)

A non-transportation related onshore facility is required to prepare and implement an FRP as outlined in 40 CFR 112.20 if:

- ☐ The facility transfers oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 U.S. gallons, OR
- ☐ The facility has a total oil storage capacity of at least 1 million U.S. gallons, AND at least one of the following is true:
- ☐ The facility does not have secondary containment sufficiently large to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation.
 - ☐ The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments.
 - ☐ The facility is located such that a discharge would shut down a public drinking water intake.
 - ☐ The facility has had a reportable discharge greater than or equal to 10,000 U.S. gallons in the past 5 years.

Facility has FRP: ☐ Yes ☒ No ☐ NA

FRP Number:

Facility has a completed and signed copy of Appendix C, Attachment C-II, "Certification of the Applicability of the Substantial Harm Criteria."

☒ Yes ☐ No

Comments: The facility stores less than the FRP-regulated quantity and is therefore not subject to the FRP regulations. Running Fox Petroleum Inc. production records for this lease go back to 2008.

SPCC TIER II QUALIFIED FACILITY APPLICABILITY—40 CFR 112.3(g)(2)

The aggregate aboveground oil storage capacity is 10,000 U.S. gallons or less AND

☐ Yes ☒ No

In the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule (if the facility has been in operation for less than three years), the facility has NOT had:

<ul style="list-style-type: none"> A single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons, OR 		<input type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> Two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve-month period¹ 		<input type="checkbox"/> Yes <input type="checkbox"/> No
IF YES TO ALL OF THE ABOVE, THEN THE FACILITY IS A TIER II QUALIFIED FACILITY?² SEE ATTACHMENT D FOR TIER II QUALIFIED FACILITY CHECKLIST		
REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3		
Date facility began operations: Running Fox Petroleum Inc. production records for this lease go back to 2008.		
Date of initial SPCC Plan preparation: unknown		Current Plan version (date/number): February 2017
112.3(a)	For drilling, production or workover facilities, including mobile or portable facilities, that are offshore or have an offshore component; or facilities required to have and submit a FRP: <ul style="list-style-type: none"> In operation on or prior to November 10, 2010: Plan prepared and/or amended and fully implemented by November 10, 2010 Facilities beginning operation after November 10, 2010: <ul style="list-style-type: none"> Plan prepared and fully implemented before drilling and workover facilities begin operations; or Plan prepared and fully implemented within six months after oil production facilities begin operations 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	For all other drilling, production or workover facilities, including mobile or portable facilities: <ul style="list-style-type: none"> In operation on or prior to November 10, 2011: Plan prepared and/or amended and fully implemented by November 10, 2011 Facilities beginning operation after November 10, 2011: <ul style="list-style-type: none"> Plan prepared and fully implemented before drilling and workover facilities begin operations; or Plan prepared and fully implemented within six months after oil production facilities begin operations 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
112.3(d)	Plan is certified by a registered Professional Engineer (PE) and includes statements that the PE attests: <ul style="list-style-type: none"> PE is familiar with the requirements of 40 CFR part 112 PE or agent has visited and examined the facility Plan is prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR part 112 Procedures for required inspections and testing have been established Plan is adequate for the facility For produced water containers subject to 112.9(c)(6), any procedure to minimize the amount of free-phase oil is designed to reduce the accumulation of free-phase oil and the procedures and frequency for required inspections, maintenance and testing have been established and are described in the Plan, if applicable 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
PE Name: Amy Michelle Reed		License No.: 2005001036
		State: MO
		Date of certification: 2/7/2017
112.3(e)(1)	Plan is available onsite if attended at least 4 hours per day. If facility is unattended, Plan is available at the nearest field office. <i>(Please note nearest field office contact information in comments section below.)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Comments: Running Fox Petroleum Inc. production records for this lease go back to 2008. The SPCC plan is dated February 7, 2017. The PE Certification page does not contain statement regarding produced water containers. The SPCC plan is available at the Fort Scott field office.		
AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4		
112.4(a),(c)	Has the facility discharged more than 1,000 U.S. gallons of oil in a single reportable discharge or more than 42 U.S. gallons in each of two reportable discharges in any 12-month period? ³	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Spill occurred 7/26/17

¹ Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

² An owner/operator who self-certifies a Tier II SPCC Plan may not include any environmentally equivalent alternatives or secondary containment impracticability determinations unless reviewed and certified by a PE.

³ A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil.

If YES	<ul style="list-style-type: none"> Was information submitted to the RA as required in §112.4(a)?⁴ 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	<ul style="list-style-type: none"> Was information submitted to the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located §112.4(c) Date(s) and volume(s) of reportable discharges(s) under this section: Were the discharges reported to the NRC⁵? 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
112.4(d),(e)	Have changes required by the RA been implemented in the Plan and/or facility?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

Comments: **Most recent spill occurred on July 26, 2017. Initial response activities conducted by Running Foxes personnel included the collection of 80 barrels (3,360 gallons) of oil from the unnamed tributary north of the spill. The unnamed tributary is the headwaters of Shiloh Creek. The unnamed tributary is a jurisdictional water body.**

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5

112.5(a)	Has there been a change at the facility that materially affects the potential for a discharge described in §112.1(b)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If YES	<ul style="list-style-type: none"> Was the Plan amended within six months of the change? Were amendments implemented within six months of any Plan amendment? 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
112.5(b)	Review and evaluation of the Plan completed at least once every 5 years? Following Plan review, was Plan amended within six months to include more effective prevention and control technology that has been field-proven to significantly reduce the likelihood of a discharge described in §112.1(b)? Amendments implemented within six months of any Plan amendment? Five year Plan review and evaluation documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
112.5(c)	Professional Engineer certification of any technical Plan amendments in accordance with all applicable requirements of §112.3(d) [Except for self-certified Plans]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

Name:	License No.:	State:	Date of certification:
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Comments: **The SPCC plan has not been amended since it was recertified in February 2017.**

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
Management approval at a level of authority to commit the necessary resources to fully implement the Plan ⁶		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Plan follows sequence of the rule or is an equivalent Plan meeting all applicable rule requirements and includes a cross-reference of provisions		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed (Note: Relevant for inspection evaluation and testing baselines.)		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
112.7(a)(2)	The Plan includes deviations from the requirements of §§112.7(g), (h)(2) and (3), and (i) and applicable subparts B and C of the rule, except the secondary containment requirements in §§112.7(c) and (h)(1), 112.9(c)(2), 112.9(d)(3), and 112.10(c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	
If YES	<ul style="list-style-type: none"> The Plan states reasons for nonconformance Alternative measures described in detail and provide equivalent environmental protection (Note: Inspector should document if the environmental equivalence is implemented in the field, in accordance with the Plan's description) 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

Describe each deviation and reasons for nonconformance: **There is an SPCC plan that covers multiple leases. The specifics regarding the individual lease operations is discussed in separate sections of the Plan.**

⁴ Triggering this threshold may disqualify the facility from meeting the Qualified Facility criteria if it occurred in the three years prior to self-certification

⁵ Inspector Note-Confirm any spills identified above were reported to NRC

112.7(a)(3)	Plan describes physical layout of facility and includes a diagram ⁷ that identifies: <ul style="list-style-type: none"> • Location and contents of all regulated fixed oil storage containers • Storage areas where mobile or portable containers are located • Completely buried tanks otherwise exempt from the SPCC requirements (marked as "exempt") • Transfer stations • Connecting pipes, including intra-facility gathering lines that are otherwise exempt from the requirements of this part under §112.1(d)(11) 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Plan addresses each of the following: <ul style="list-style-type: none"> (i) For each fixed container, type of oil and storage capacity (see Attachment A of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities (ii) Discharge prevention measures, including procedures for routine handling of products (loading, unloading, and facility transfers, etc.) (iii) Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge (iv) Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources) (v) Methods of disposal of recovered materials in accordance with applicable legal requirements (vi) Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors <i>with an agreement for response</i>, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b) 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <div></div>
112.7(a)(4)	<i>Does not apply if the facility has submitted an FRP under §112.20:</i> Plan includes information and procedures that enable a person reporting an oil discharge as described in §112.1(b) to relate information on the: <ul style="list-style-type: none"> • Exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimates of the total quantity discharged; • Estimates of the quantity discharged as described in §112.1(b); • Source of the discharge; • Description of all affected media; • Cause of the discharge; • Damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; and • Names of individuals and/or organizations who have also been contacted. 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.7(a)(5)	<i>Does not apply if the facility has submitted a FRP under §112.20:</i> Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.7(b)	Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
Comments: Reporting procedures are adequate but the NRC was not notified of the July 26, 2017, release.			
112.7(c)	Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), except as provided in §112.7(k) of this section for certain qualified operational equipment and §112.9(d)(3) for certain flowlines and intra-facility gathering lines at an oil production facility. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. See Attachment A of this checklist. For onshore facilities, one of the following or its equivalent:		

		PLAN	FIELD
	<ul style="list-style-type: none"> Dikes, berms, or retaining walls sufficiently impervious to contain oil, Curbing or drip pans, Sumps and collection systems, Culverting, gutters or other drainage systems, Weirs, booms or other barriers, Spill diversion ponds, Retention ponds, or Sorbent materials. <p>Identify which of the following are present at the facility and if appropriate containment and/or diversionary structures or equipment are provided as described above:</p> <p><input checked="" type="checkbox"/> Bulk storage containers</p> <p><input type="checkbox"/> Mobile/portable containers</p> <p><input checked="" type="checkbox"/> Oil-filled operational equipment (as defined in 112.2)</p> <p><input type="checkbox"/> Other oil-filled equipment (i.e., manufacturing equipment)</p> <p><input checked="" type="checkbox"/> Piping and related appurtenances</p> <p><input type="checkbox"/> Mobile refuelers of non-transportation-related tank cars</p> <p><input checked="" type="checkbox"/> Transfer areas, equipment and activities</p> <p><input checked="" type="checkbox"/> Identify any other equipment or activities that are not listed above: <u>gathering lines</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>
112.7(d)	<p>Secondary containment for one (or more) of the following provisions is determined to be impracticable:</p> <p><input checked="" type="checkbox"/> General secondary containment §112.7(c)</p> <p><input type="checkbox"/> Loading/unloading rack §112.7(h)(1)</p> <p><input type="checkbox"/> Bulk storage containers §112.8(c)(2)/112.12(c)(2)</p> <p><input type="checkbox"/> Mobile/portable containers §112.8(c)(11)/112.12(c)(11)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
If YES	<ul style="list-style-type: none"> The impracticability of secondary containment is clearly demonstrated and described in the Plan For bulk storage containers,⁸ periodic integrity testing of containers and integrity and leak testing of the associated valves and piping is conducted <p><i>(Does not apply if the facility has submitted a FRP under §112.20):</i></p> <ul style="list-style-type: none"> Contingency Plan following the provisions of 40 CFR part 109 is provided (see Attachment C of this checklist) AND Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p></p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>
<p>Comments: Bulk containers are within sized secondary containment. The secondary containment berm is not maintained at a consistent height or at a height that is in accordance with the suggested calculations provided in the SPCC plan. The SPCC plan states that the berm will be maintained at a height of 30 inches. The berm was measured on July 27, 2017, at a height of 6 inches on the south side of the berm. General secondary containment of oil field flowlines is cited as impracticable; therefore, an Oil Spill Contingency Plan has been developed as part of the plan</p>			
		PLAN	FIELD
112.7(e)	<p>Inspections and tests conducted in accordance with written procedures</p> <p>Record of inspections or tests signed by supervisor or inspector</p> <p>Kept with Plan for at least 3 years (see Attachment B of this checklist)⁹</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
112.7(f)	<p>Personnel, training, and oil discharge prevention procedures</p> <p>(1) Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>

⁸ These additional requirements apply only to bulk storage containers, when an impracticability determination has been made by the PE

(2)	Person designated as accountable for discharge prevention at the facility and reports to facility management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3)	Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.7(h)	Tank car and tank truck loading/unloading rack ¹⁰ is present at the facility <i>Loading/unloading rack</i> means a fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm, and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If YES (1)	Does loading/unloading rack drainage flow to catchment basin or treatment facility designed to handle discharges or use a quick drainage system?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	Containment system holds at least the maximum capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(2)	An interlocked warning light or physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in the area adjacent to the loading or unloading rack to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(3)	Lower-most drains and all outlets on tank cars/trucks inspected prior to filling/departure, and, if necessary ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Comments: Monthly tank inspections are conducted but some of the monthly records were not provided for review. Monthly inspections from September and November 2016 and May and June 2017 were not provided. Facility does not have a truck loading/unloading rack.			
		PLAN	FIELD
112.7(i)	Brittle fracture evaluation of field-constructed aboveground containers is conducted after tank repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or after a discharge/failure due to brittle fracture or other catastrophe, and appropriate action taken as necessary (applies to only field-constructed aboveground containers in production service, drilling, and workover service)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
112.7(j)	Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.7(k)	Qualified oil-filled operational equipment is present at the facility ¹¹ <i>Oil-filled operational equipment</i> means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g., those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device. Check which apply: Secondary Containment provided in accordance with 112.7(c) <input type="checkbox"/> Alternative measure described below (confirm eligibility) <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
112.7(k)	Qualified Oil-Filled Operational Equipment		
	• Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within the three years prior to Plan certification date?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	

¹⁰ Note that a tank car/truck loading/unloading rack must be present for §112.7(h) to apply

	<ul style="list-style-type: none"> Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?¹² 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NA			
	If YES for either, secondary containment in accordance with §112.7(c) is required						
	<ul style="list-style-type: none"> Facility procedure for inspections or monitoring program to detect equipment failure and/or a discharge is established and documented 	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
	<p>Does not apply if the facility has submitted a FRP under §112.20:</p> <ul style="list-style-type: none"> Contingency plan following 40 CFR part 109 (see Attachment C of this checklist) is provided in Plan AND Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Plan 	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA

Comments: **Facility has oil pumpjacks. An Oil Spill Contingency Plan has been developed for the facility.**

ONSHORE OIL PRODUCTION FACILITIES—40 CFR 112.9

☐ NA

PLAN

FIELD

(Drilling and workover facilities are excluded from the requirements of §112.9)

Production facility means all structures (including but not limited to wells, platforms, or storage facilities), piping (including but not limited to flowlines or intra-facility gathering lines), or equipment (including but not limited to workover equipment, separation equipment, or auxiliary non-transportation-related equipment) used in the production, extraction, recovery, lifting, stabilization, separation or treating of oil (including condensate), or associated storage or measurement, and is located in an oil or gas field, at a facility. This definition governs whether such structures, piping, or equipment are subject to a specific section of this part.

112.9(b) Oil Production Facility Drainage

(1)	At tank batteries, separation and treating areas where there is a reasonable possibility of a discharge as described in §112.1(b), drains for dikes or equivalent measures are closed and sealed except when draining uncontaminated rainwater. Accumulated oil on the rainwater is removed and then returned to storage or disposed of in accordance with legally approved methods Prior to drainage, diked area inspected and action taken as provided below: <ul style="list-style-type: none"> 112.8(c)(3)(ii) - Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b) 112.8(c)(3)(iii) - Bypass valve opened and resealed under responsible supervision 112.8(c)(3)(iv) - Adequate records of drainage are kept; for example, records required under permits issued in accordance with §122.41(j)(2) and (m)(3) 	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NA
(2)	Field drainage systems (e.g., drainage ditches or road ditches) and oil traps, sumps, or skimmers inspected at regularly scheduled intervals for oil, and accumulations of oil promptly removed	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA

112.9(c) Oil Production Facility Bulk Storage Containers

Bulk storage container means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.

(1)	Containers materials and construction are compatible with material stored and conditions of storage such as pressure and temperature	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
(2)	Except as allowed for flow-through process vessels in §112.9(c)(5) and produced water containers in §112.9(c)(6), secondary containment provided for all tank battery, separation and treating facilities sized to hold the capacity of largest single container and sufficient freeboard for precipitation.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NA
	Drainage from undiked area safely confined in a catchment basin or holding pond.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NA

¹² Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 4,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire

(3)	Except as allowed for flow-through process vessels in §112.9(c)(5) and produced water containers in §112.9(c)(6), periodically and upon a regular schedule, visually inspect containers for deterioration and maintenance needs, including foundation and supports of each container on or above the surface of the ground	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(4)	<p>New and old tank batteries engineered/updated in accordance with good engineering practices to prevent discharges including at least one of the following:</p> <ul style="list-style-type: none"> Adequate container capacity to prevent overflow if a pumper/gauger is delayed in making regularly scheduled rounds; Overflow equalizing lines between containers so that a full container can overflow to an adjacent container; Adequate vacuum protection to prevent container collapse; or High level sensors to generate and transmit an alarm to the computer where the facility is subject to a computer production control system 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA

Comments: Bulk containers were all within sized secondary containment. No records were provided regarding dike drainage because the facility reportedly pumps drainage water back into produced water tanks for injection into wellfield. The secondary containment berm is not maintained at a consistent height or at a height that is in accordance with the suggested calculations provided in the SPCC plan. The SPCC plan states that the berm will be maintained at a height of 30 inches. The berm was measured on July 27, 2017, at a height of 6 inches on the south side of the berm.

		PLAN	FIELD
(5)	Flow-through Process Vessels. Alternate requirements in lieu of sized secondary containment required in (c)(2) and requirements in (c)(3) above for facilities with flow-through process vessels:		
(i)	Flow-through process vessels and associated components (e.g. dump valves) are periodically and on a regular schedule visually inspected and/or tested for leaks, corrosion, or other conditions that could lead to a discharge as described in §112.1(b)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(ii)	Corrective actions or repairs have been made to flow-through process vessels and any associated components as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(iii)	Oil removed or other actions initiated to promptly stabilize and remediate any accumulation of oil discharges associated with the produced water container	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(iv)	All flow-through process vessels comply with §§112.9(c)(2) and (c)(3) within six months of any flow-through process vessel discharge of more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b) or discharges of more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period. ¹³	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(6)	Produced Water Containers. Alternate requirements in lieu of sized secondary containment required in (c)(2) and requirements in (c)(3) above for facilities with produced water containers:		
(i)	<p>A procedure is implemented on a regular schedule for each produced water container that is designed to separate the free-phase oil that accumulates on the surface of the produced water.</p> <ul style="list-style-type: none"> A description is included in the Plan of the procedures, frequency, and amount of free-phase oil expected to be maintained inside the container; PE certifies in accordance with §112.3(d)(1)(vi); Records of such events are maintained in accordance with §112.7(e). 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <div style="background-color: #cccccc; height: 100px;"></div> <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<p>If this procedure is not implemented as described in the Plan or no records are maintained, then facility owner/operator must comply with §112.9(c)(2) and (c)(3).</p>			
(ii)	Each produced water container and associated piping is visually inspected, on a regular basis, for leaks, corrosion, or other conditions that could lead to a discharge as described in §112.1(b) in accordance with good engineering practice.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

¹³ Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire

(iii)	Corrective action or necessary repairs were made to any produced water container and associated piping as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(iv)	Oil removed or other actions initiated to promptly stabilize and remediate any accumulation of oil discharges associated with the produced water container.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(v)	All produced water containers comply with §§112.9(c)(2) and (c)(3) within six months of any produced water container discharge of more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b) or discharges of more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period. ¹³	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

Comments: **Flow-through process vessels and produced water containers associated with the lease are within sized secondary containment.**

		PLAN	FIELD
112.9(d) Facility transfer operations, pumping, and facility process			
(1)	All aboveground valves and piping associated with transfer operations are inspected periodically and upon a regular schedule to determine their general condition. Include the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, pumping well polish rod stuffing boxes, bleeder and gauge valves, and other such items	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2)	Saltwater (oil field brine) disposal facilities inspected often to detect possible system upsets capable of causing a discharge, particularly following a sudden change in atmospheric temperature	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3)	If flowlines and intra-facility gathering lines are not provided with secondary containment in accordance with §112.7(c) and the facility is not required to submit an FRP under §112.20, then the SPCC Plan includes:		
(i)	• An oil spill contingency plan following the provisions of 40 CFR part 109 ¹⁴	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(ii)	• A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that might be harmful	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(4)	A flowline/intra-facility gathering line maintenance program to prevent discharges is prepared and implemented and includes the following procedures:		
(i)	Flowlines and intra-facility gathering lines and associated valves and equipment are compatible with the type of production fluids, their potential corrosivity, volume, and pressure, and other conditions expected in the operational environment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(ii)	Flowlines and intra-facility gathering lines and associated appurtenances are visually inspected and/or tested on a periodic and regular schedule for leaks, oil discharges, corrosion, or other conditions that could lead to a discharge as described in §112.1(b).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	If flowlines and intra-facility gathering lines are not provided with secondary containment in accordance with §112.7(c), the frequency and type of testing allows for the implementation of a contingency plan as described under 40 CFR 109 or an FRP submitted under §112.20	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(iii)	Repairs or other corrective actions are made to any flowlines and intra-facility gathering lines and associated appurtenances as indicated by regularly scheduled visual inspections, tests, or evidence of a discharge	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA

(iv)	Oil removed or other actions initiated to promptly stabilize and remediate any accumulations of oil discharges associated with the flowlines, intra-facility gathering lines, and associated appurtenances	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
ONSHORE OIL DRILLING AND WORKOVER FACILITIES—40 CFR 112.10			<input checked="" type="checkbox"/> NA
112.10(b)	Mobile drilling or workover equipment is positioned or located to prevent a discharge as described in §112.1(b)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.10(c)	Catchment basins or diversion structures are provided to intercept and contain discharges of fuel, crude oil, or oily drilling fluids	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.10(d)	Blowout prevention (BOP) assembly and well control system installed before drilling below any casing string or during workover operations	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	BOP assembly and well control system is capable of controlling any well-head pressure that may be encountered while on the well	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Comments: The SPCC plan itemizes inspection procedures for flowlines associated with the lease. Additionally, a Contingency Plan has been developed for the lease. Documentation of monthly inspections was found to be incomplete.			

ATTACHMENT A: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE

Documentation of Field Observations for Containers and Associated Requirements

Container Type	Storage Capacity (gal)	Type of Oil	Type of Containment/ Drainage Control	Overfill Protection and Testing & Inspections
Fiberglass and Steel ASTs	8,820	crude oil and produced water	Earthen berm containment area. (Note: The site inspection determined that the height of the berm at the low area was measured at six inches where gravel and other solid material had filled in the containment.	Flow through to oil storage or produced water tank; otherwise no overfill protection. Tanks inspected monthly.
	8,400	crude		Redundant, interconnected tanks, otherwise no overfill protection. Tanks inspected monthly.
	8,400	crude		
	8,400	crude oil and produced water		Redundant, interconnected tanks, pumped to injection fields otherwise no overfill protection. Tanks inspected monthly.
	8,400			
	8,400			
	8,400			
	50,820	gallons		

ATTACHMENT B: SPCC INSPECTION AND TESTING CHECKLIST

Required Documentation of Tests and Inspections

Records of inspections and tests required by 40 CFR part 112 signed by the appropriate supervisor or inspector must be kept by all facilities with the SPCC Plan for a period of three years. Records of inspections and tests conducted under usual and customary business practices will suffice. Documentation of the following inspections and tests should be kept with the SPCC Plan.

Inspection or Test		Documentation		Not Applicable
		Present	Not Present	
112.7—General SPCC Requirements				
(d)	Integrity testing for bulk storage containers with no secondary containment system and for which an impracticability determination has been made	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Integrity and leak testing of valves and piping associated with bulk storage containers with no secondary containment system and for which an impracticability determination has been made	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(h)(3)	Inspection of lowermost drain and all outlets of tank car or tank truck prior to filling and departure from loading/unloading rack	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(i)	Evaluation of field-constructed aboveground containers for potential for brittle fracture or other catastrophic failure when the container undergoes a repair, alteration, reconstruction or change in service or has discharged oil or failed due to brittle fracture failure or other catastrophe	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k(2)(i)	Inspection or monitoring of qualified oil-filled operational equipment when the equipment meets the qualification criteria in §112.7(k)(1) and facility owner/operator chooses to implement the alternative requirements in §112.7(k)(2) that include an inspection or monitoring program to detect oil-filled operational equipment failure and discharges	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
112.9—Onshore Oil Production Facilities (excluding drilling and workover facilities)				<input type="checkbox"/> NA
(b)(1)	Rainwater released directly from diked containment areas inspected following §§112.8(c)(3)(ii), (iii) and (iv), including records of drainage kept	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)(2)	Field drainage systems, oil traps, sumps, and skimmers inspected regularly for oil, and accumulations of oil promptly removed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)(3)	Containers, foundations and supports inspected visually for deterioration and maintenance needs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)(5)(i)	In lieu of having sized secondary containment, flow-through process vessels and associated components visually inspected and/or tested periodically and on a regular schedule for conditions that could result in a discharge as described in §112.1(b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)(6)(ii)	In lieu of having sized secondary containment, produced water containers and associated piping are visually inspected and/or tested for leaks, corrosion, or other conditions that could lead to a discharge as described in §112.1(b) in accordance with good engineering practice	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)(1)	All aboveground valves and piping associated with transfer operations are regularly inspected	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)(2)	Saltwater disposal facilities inspected often to detect possible system upsets capable of causing a discharge	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)(4)(ii)	For flowlines and intra-facility gathering lines without secondary containment, in accordance with §112.7(c), lines are visually inspected and/or tested periodically and on a regular schedule to allow implementing the part 109 contingency plan or the FRP submitted under §112.20	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ATTACHMENT C: SPCC CONTINGENCY PLAN REVIEW CHECKLIST

☐ NA

40 CFR Part 109--Criteria for State, Local and Regional Oil Removal Contingency Plans

If SPCC Plan includes an impracticability determination for secondary containment in accordance with §112.7(d), the facility owner/operator is required to provide an oil spill contingency plan following 40 CFR part 109, unless he or she has submitted a FRP under §112.20. An oil spill contingency plan may also be developed, unless the facility owner/operator has submitted a FRP under §112.20 as one of the required alternatives to general secondary containment for qualified oil filled operational equipment in accordance with §112.7(k).

109.5--Development and implementation criteria for State, local and regional oil removal contingency plans ¹⁵		Yes	No
(a)	Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(1)	The identification of critical water use areas to facilitate the reporting of and response to oil discharges.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(2)	A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(3)	Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., National Contingency Plan (NCP)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(4)	An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(1)	The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(2)	An estimate of the equipment, materials and supplies that would be required to remove the maximum oil discharge to be anticipated.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(3)	Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Provisions for well-defined and specific actions to be taken after discovery and notification of an oil discharge including:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(1)	Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(2)	Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(3)	A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(4)	Provisions for varying degrees of response effort depending on the severity of the oil discharge.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(5)	Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ATTACHMENT D: TIER II QUALIFIED FACILITY CHECKLIST

☒ NA

TIER II QUALIFIED FACILITY PLAN REQUIREMENTS —40 CFR 112.6(b)

112.6(b)(1) (i) He or she is familiar with the requirements of 40 CFR part 112 (ii) He or she has visited and examined the facility ¹⁶ (iii) The Plan has been prepared in accordance with accepted and sound industry practices and standards and with the requirements of this part (iv) Procedures for required inspections and testing have been established (v) He or she will fully implement the Plan (vi) The facility meets the qualification criteria set forth under §112.3(g)(2) (vii) The Plan does not deviate from any requirements as allowed by §§112.7(a)(2) and 112.7(d), except as described under §112.6(b)(3)(i) or (ii) (viii) The Plan and individual(s) responsible for implementing the Plan have the full approval of management and the facility owner or operator has committed the necessary resources to fully implement the Plan.	Plan Certification: Owner/operator certified in the Plan that:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.6(b)(2) If YES	Technical Amendments: The owner/operator self-certified the Plan's technical amendments for a change in facility design, construction, operation, or maintenance that affected potential for a §112.1(b) discharge • Certification of technical amendments is in accordance with the self-certification provisions of §112.6(b)(1). (i) A PE certified a portion of the Plan (i.e., Plan is informally referred to as a hybrid Plan) If YES • The PE also certified technical amendments that affect the PE certified portion of the Plan as required under §112.6(b)(4)(ii) (ii) The aggregate aboveground oil storage capacity increased to more than 10,000 U.S. gallons as a result of the change If YES	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	<i>The facility no longer meets the Tier II qualifying criteria in §112.3(g)(2) because it exceeds 10,000 U.S. gallons in aggregate aboveground storage capacity.</i>	
112.6(b)(3) If YES	Plan Deviations: Does the Plan include environmentally equivalent alternative methods or impracticability determinations for secondary containment? Identify the alternatives in the hybrid Plan: • Environmental equivalent alternative method(s) allowed under §112.7(a)(2); • Impracticability determination under §112.7(d)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.6(b)(4)	• For each environmentally equivalent measure, the Plan is accompanied by a written statement by the PE that describes: the reason for nonconformance, the alternative measure, and how it offers equivalent environmental protection in accordance with §112.7(a)(2); • For each secondary containment impracticability determination, the Plan explains the reason for the impracticability determination and provides the alternative measures to secondary containment required in §112.7(d) AND (i) PE certifies in the Plan that: (A) He/she is familiar with the requirements of 40 CFR Part 112 (B) He/she or a representative agent has visited and examined the facility (C) The alternative method of environmental equivalence in accordance with §112.7(a)(2) or the determination of impracticability and alternative measures in accordance with §112.7(d) is consistent with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA

Comments: **The facility is not a qualified Tier II facility.**

¹⁶ Note that only the person certifying the Plan can make the site visit

ATTACHMENT E: ADDITIONAL COMMENTS

Running Foxes Petroleum – North Stoner Lease is an oil production operation located in Vernon County, Missouri. The storage tank battery associated with the lease is located just south of the South 100 Road and Hudson Road intersection about 3.4 miles northwest of Richards, Missouri. The lease is located approximately 50 feet east of the Missouri/Kansas border. The North Stoner Lease contains six bulk storage tanks (two crude oil, three produced water, and one gun barrel separator). The North Stoner Lease was selected for an SPCC inspection based on a spill that occurred on July 26, 2017. The North Stoner Lease has had other reported spills and several complaints made to the Missouri Department of Natural Resources (MDNR) and EPA by concerned citizens. The EPA previously completed an SPCC inspection at the North Stoner Lease on June 13, 2016, while following up on a release that occurred on June 6, 2016 at the nearby RFP Emmerson Lease.

The release that occurred July 26, 2017, was first discovered by a nearby landowner and reported to both MDNR and EPA. Upon arrival at the tank battery, Running Foxes Petroleum (RFP) personnel noted that all of the tank valves had been opened and transfer lines connecting the crude oil and produced water tanks were broken. Based on suspected vandalism causing the release, RFP notified the Vernon County Missouri and Bourbon County Kansas Sheriff's Departments. RFP personnel concluded that approximately 16,800 gallons of oil/produced water were released from the tanks, of which, 8,400 gallons breached secondary containment and were released to the environment. The discharged oil flowed north along South 100 Road where it flowed past the RFP – Emmerson Lease and into an unnamed tributary that flows west to Shiloh Creek. The unnamed tributary did not contain flowing water at the time of the release. Oil spill cleanup activities commenced upon discovery of the spill and were conducted by RFP. RFP reported to EPA that on July 26, 2017, RFP recovered approximately 3,360 gallons of oil from the unnamed tributary using their company vacuum truck. Cleanup activities continued through August 9, 2017, when EPA On-Scene Coordinator Mindy Luetke conducted a final site visit. Additional details regarding EPA's response to the Running Foxes Petroleum Oil Spill can be found at <https://response.epa.gov/RunningFoxes>. It should be noted that RFP did not report the release to the National Response Center.

The SPCC inspection was conducted on July 28, 2017. Mr. John Michels, Field Supervisor with RFP, met with EPA at the lease during the inspection. Mr. Michels provided EPA with a copy of the most current SPCC plan, which was dated February 7, 2017.

The SPCC Plan is intended to cover all RFP leases, including the North Stoner Lease. Lease specific information is addressed in separate sections of the plan. A review of the SPCC plan sections pertaining to the North Stoner Lease determined that the description of the secondary containment dimensions and containment capacity is not accurate. The capacity of the containment area is described as 38,586 gallons based on a design berm height of 30 inches. The actual berms were measured at approximately 6 inches in height at the lowest point on the south side of the containment.

There are no flow-through process vessels or produced water containers, associated with the lease, that are outside of sized secondary containment. An Oil Spill Contingency Plan has been developed, as the SPCC plan cites general secondary containment associated with oil field flowlines as impracticable.

Monthly inspection records were requested dating back to completion of the 2016 SPCC inspection. RFP provided the requested inspection records; however, they were found to be incomplete. Several months, including September and November 2016 and May and June 2017 were not provided. No records were provided regarding dike drainage because the facility reportedly pumps drainage water back into produced water tanks for injection into the wellfield. Training records were maintained and available.

ATTACHMENT F: PHOTO DOCUMENTATION NOTES

Photo Number	SPCC Report Photolog Number ^A	Direction	Description
IMG_0510	8	South	View of containment where oil spilled over
IMG_0528	9	North	View of containment where oil spilled over
IMG_0549	6	West	View of EPA measuring berm height
IMG_0553	7	Northeast	View of EPA measuring berm height - height at south side was 6 inches
IMG_0575	11	East	View of oil in unnamed tributary
IMG_0581	10	East	View of oil in unnamed tributary
IMG_0607	1	South	View of North Stoner lease sign
IMG_0608	NA	East	View of tank transfer that was broken
IMG_0609	NA	West	View of tank transfer that was broken
IMG_0610	NA	East	View of tank battery/secondary containment
IMG_0611	3	West	View of tank battery/secondary containment
IMG_0612	4	Southwest	View of tank battery/secondary containment with vegetation
IMG_0613	NA	Northeast	View of pumphouse within secondary containment
IMG_0614	5	North	View of pumphouse within secondary containment
IMG_0615	NA	West	View of oil-stained ground in secondary containment
IMG_0616	2	West	View of tank battery/secondary containment
IMG_0617	NA	North	View of area north of tank battery
IMG_0618	NA	West	View of gravel lot north of tank battery
IMG_0619	12	East	View of wellhead associated with lease
IMG_0620	NA	East	View of wellhead associated with lease
IMG_0621	NA	West	View of wellhead associated with lease
IMG_0622	NA	South	View of wells associated with lease

Notes:

^A Photolog number corresponds to photo number on the SPCC report photolog

NA Not applicable

All Photographs listed above were taken by OSC Jeff Pritchard on July 27 and 28, 2017.

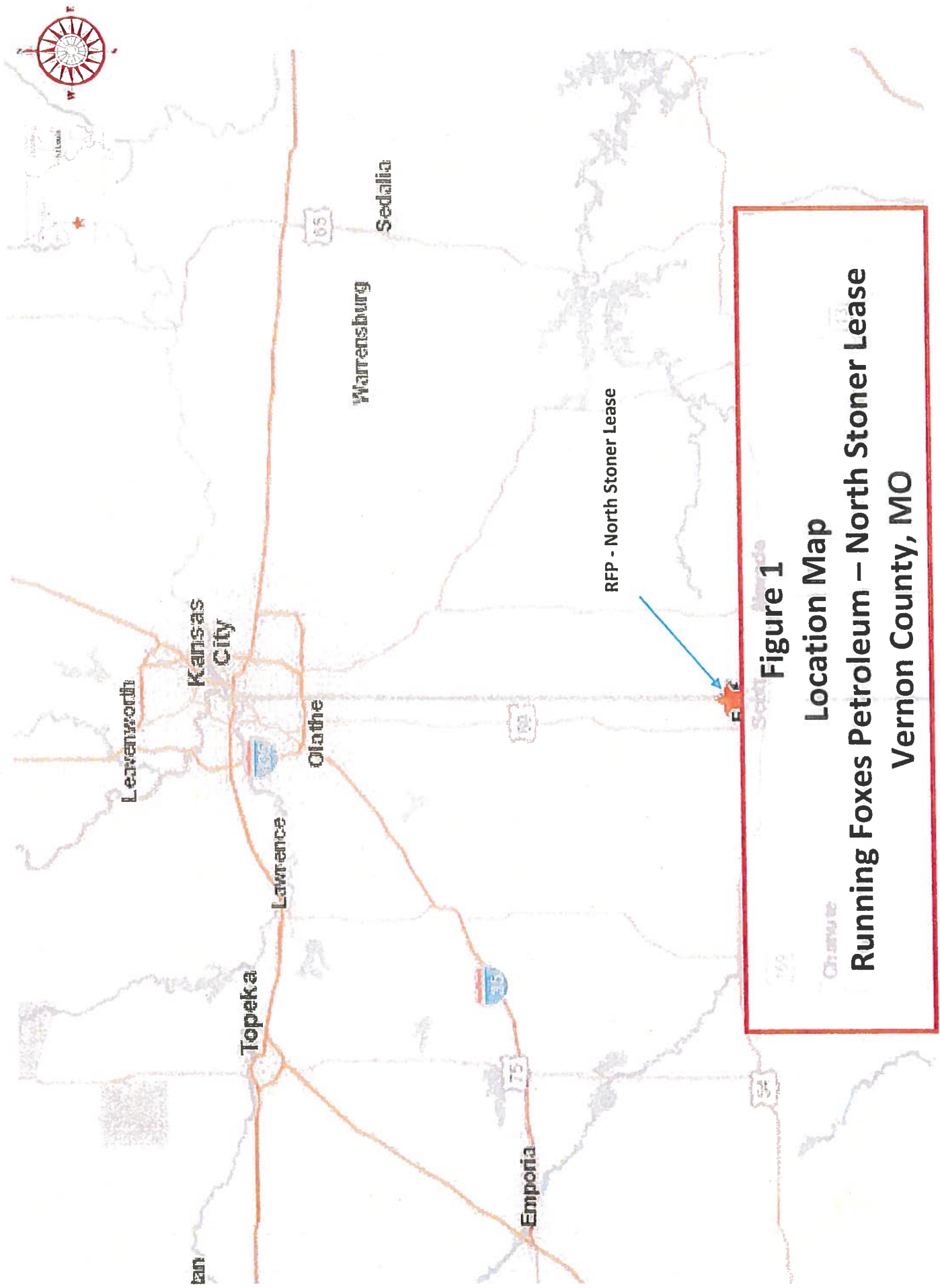


Figure 1
Location Map
Running Foxes Petroleum – North Stoner Lease
Vernon County, MO

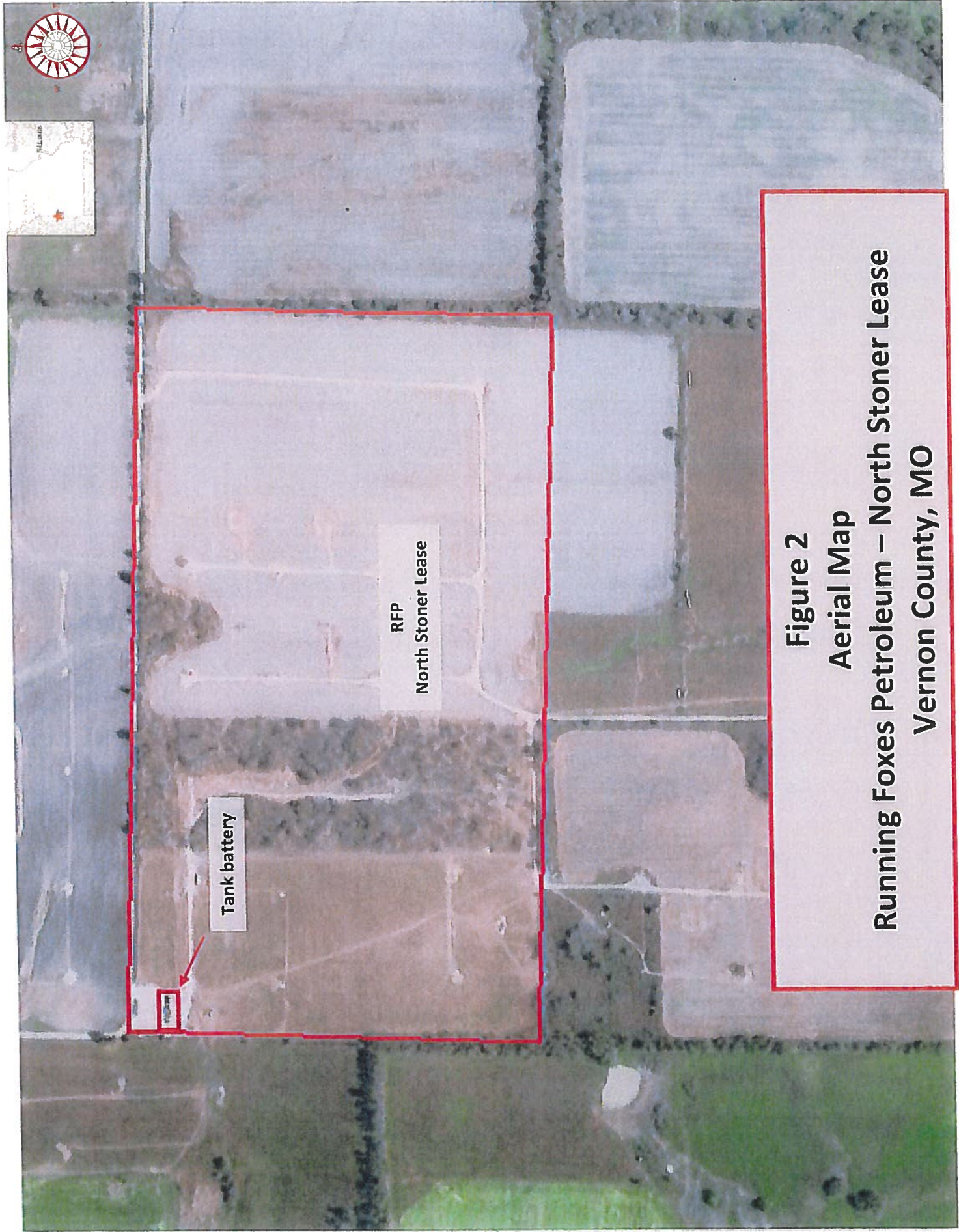


Figure 2
Aerial Map
Running Foxes Petroleum – North Stoner Lease
Vernon County, MO

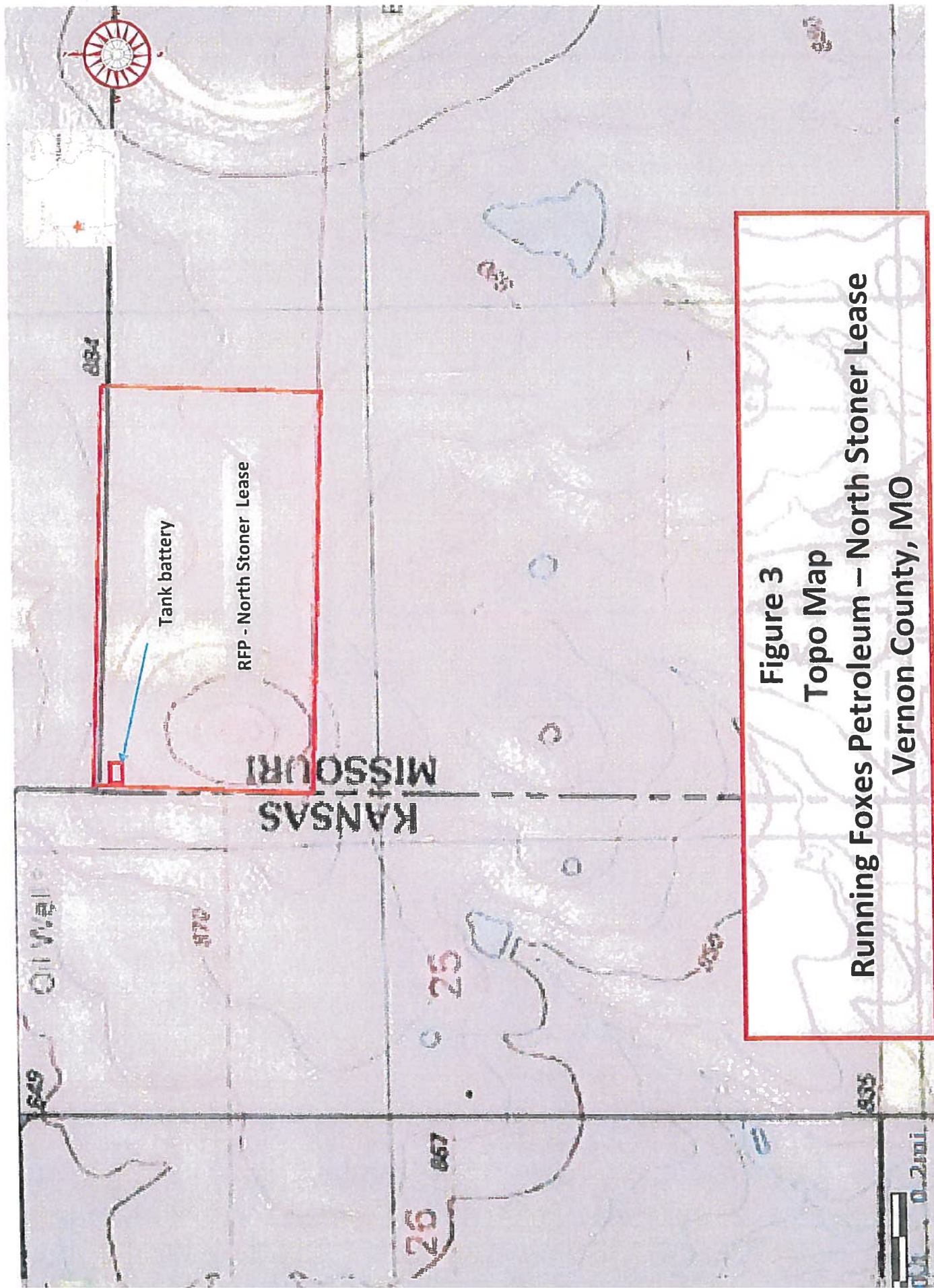
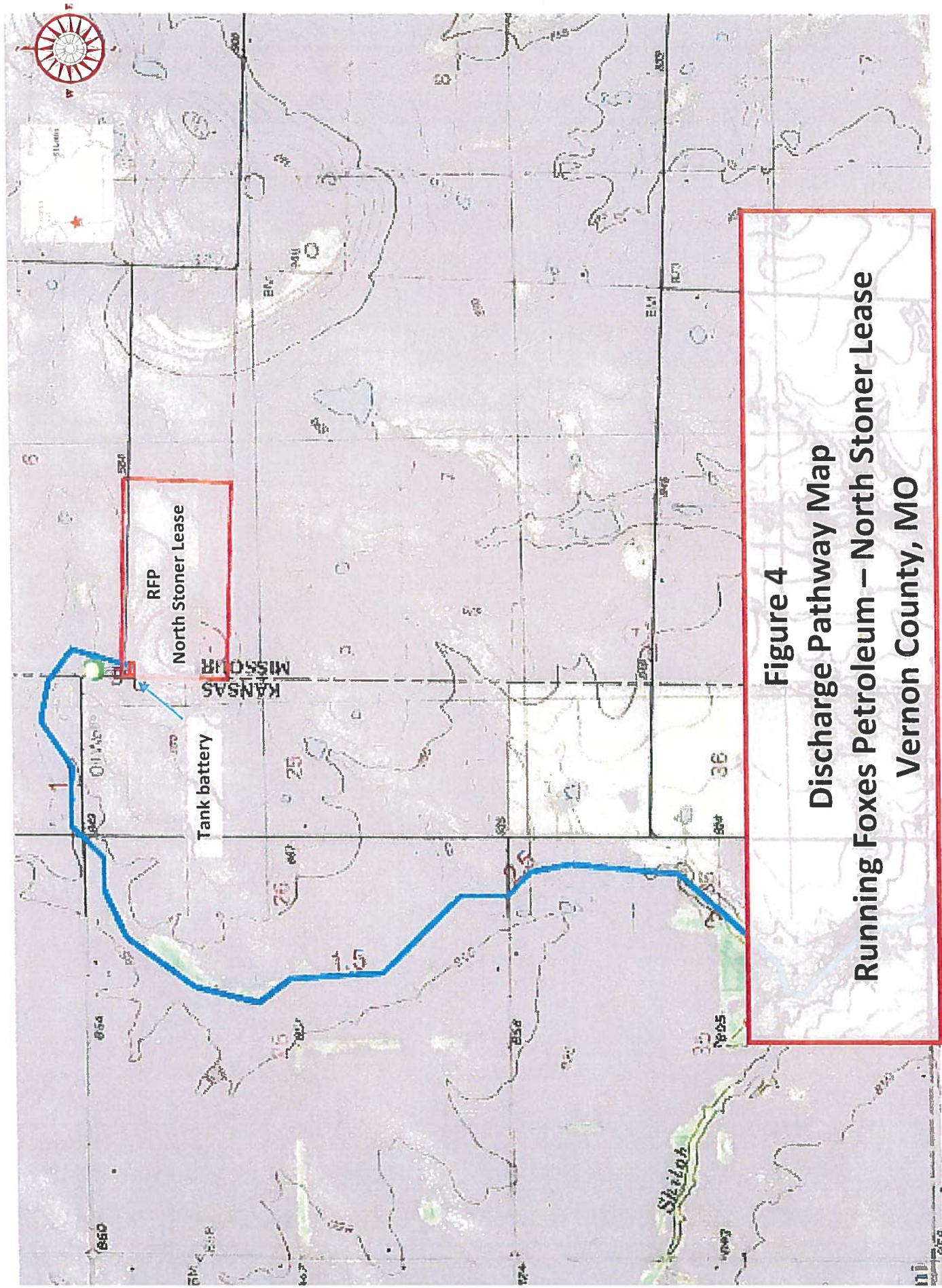


Figure 3
Topo Map
Running Foxes Petroleum – North Stoner Lease
Vernon County, MO



Running Foxes Petroleum – North Stoner Lease
Vernon County, Missouri

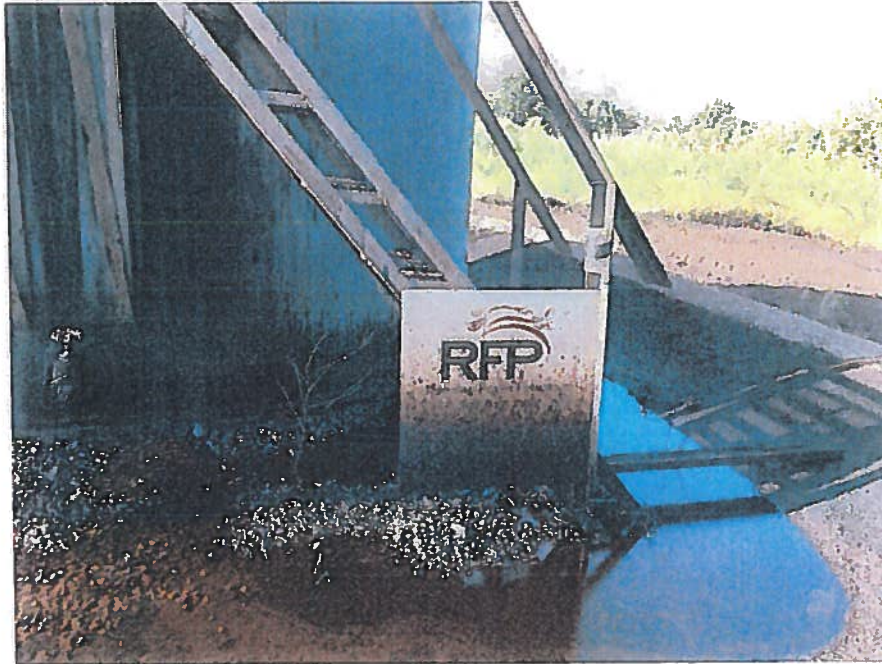


Photo No.: 1	Date: July 28, 2017	Time: AM
Photographer: Jeff Pritchard	Direction: South	
Description: Photograph of the Running Foxes Petroleum – North Stoner Lease tank battery sign.		

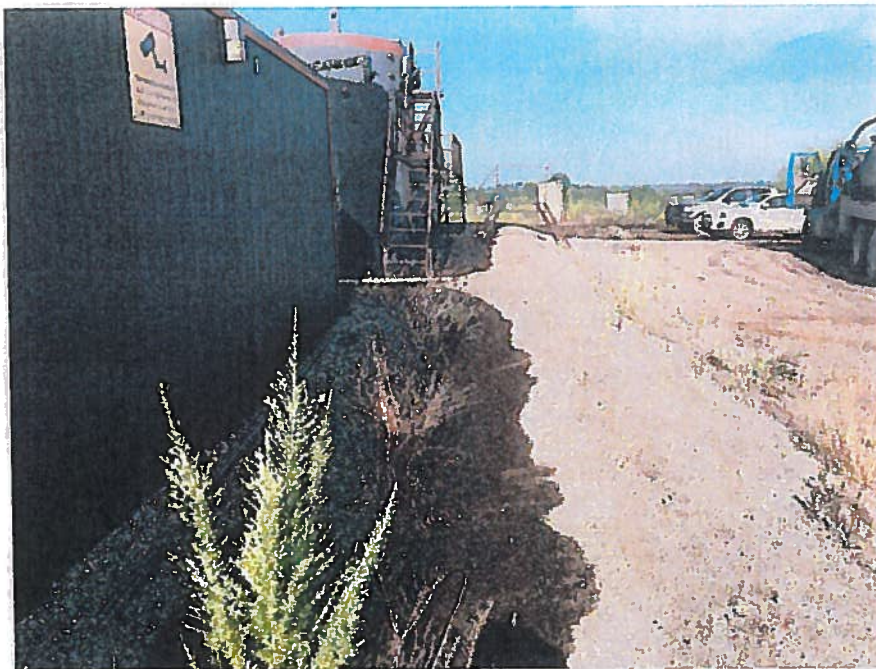


Photo No.: 2	Date: July 28, 2017	Time: AM
Photographer: Jeff Pritchard		Direction: West
Description: Photograph of the north side of the North Stoner Lease tank battery. A spill occurred at this lease on July 26, 2017.		

Running Foxes Petroleum – North Stoner Lease
Vernon County, Missouri



Photo No.: 3	Date: July 28, 2017	Time: AM
Photographer: Jeff Pritchard		Direction: West
Description: Photograph of the southwest corner of secondary containment. Transfer lines connecting the crude oil tanks were broken.		



Photo No.: 4	Date: July 28, 2017	Time: AM
Photographer: Jeff Pritchard		Direction: West
Description: Photograph of the south side of secondary containment where vegetation was present.		

Running Foxes Petroleum – North Stoner Lease
Vernon County, Missouri



Photo No.: 5	Date: July 28, 2017	Time: AM
Photographer: Jeff Pritchard		Direction: North
Description: Photograph of the east portion of secondary containment where vegetation was present.		



Photo No.: 6	Date: July 28, 2017	Time: AM
Photographer: Jeff Pritchard	Direction: West	
Description: Photograph of EPA inspectors measuring secondary containment berm height during SPCC inspection.		

Running Foxes Petroleum – North Stoner Lease
Vernon County, Missouri



Photo No.: 7	Date: July 28, 2017	Time: AM
Photographer: Jeff Pritchard	Direction: Northeast	
Description: Photograph of berm height measurement from the south side of containment. The measured height was approximately 6 inches.		



Photo No.: 8	Date: July 28, 2017	Time: AM
Photographer: Jeff Pritchard	Direction: South	
Description: Photograph of the west side of secondary containment where oil spilled over during the release on July 26, 2017.		

Running Foxes Petroleum – North Stoner Lease
Vernon County, Missouri



Photo No.: 9	Date: July 28, 2017	Time: AM
Photographer: Jeff Pritchard	Direction: North	
Description: Photograph of the northwest corner of secondary containment where oil spilled over during the release on July 26, 2017.		



Photo No.: 10	Date: July 27, 2017	Time: AM
Photographer: Jeff Pritchard		Direction: East
Description: Photograph of oil from the North Stoner Lease spill in the unnamed tributary to Shiloh Creek.		

**Running Foxes Petroleum – North Stoner Lease
Vernon County, Missouri**



Photo No.: 11	Date: July 27, 2017	Time: AM
Photographer: Jeff Pritchard	Direction: East	
Description: Photograph of oil from the North Stoner Lease spill in the unnamed tributary to Shiloh Creek.		



Photo No.:12	Date: July 28, 2017	Time: AM
Photographer: Jeff Pritchard		Direction: East
Description: Photograph of a pump jack associated with the North Stoner Lease.		